

# Federal Defenders OF NEW YORK, INC.

Tamara Giwa  
Executive Director

## BY ECF & email

Honorable Philip M. Halpern  
United States District Judge  
Southern District of New York  
The Hon. Charles. L. Brieant Jr.  
Federal Building and U.S. Courthouse  
300 Quarropas St.  
White Plains, NY 10601

**Re: *United States of America v. Roland Barner,*  
24 Cr. 243 (PMH)**

Honorable Judge Halpern:

With the consent of the Government, I respectfully request the Court extend the filing deadlines for submission of the sentencing materials in this case. Sentencing is scheduled to take place on Thursday, June 5, 2025, at 2:30 P.M.

I apologize to the Court and opposing counsel for filing this request only now. Defense sentencing submissions were due on or before Wednesday, April 9, 2025, with the Government's submission due by Wednesday, April 16, 2025. However, the Defense was not able to adhere to this schedule because medical issues and an unrelated family emergency required counsel to reschedule meetings with Mr. Barner to review the Presentence Report and exhausted the time budgeted to completing the defense sentencing submission.

I have conferred with Assistant United States Attorney Shaun Werbelow, who consents to the requested extension on behalf of the United States.

I respectfully request the Court extend the schedule for submission of sentencing materials to require the Defense to make its submission no later than Wednesday, April 23, 2025, with the Government's due on Wednesday, April 30, 2025.

Thank you for considering this request.

Respectfully submitted,



Christopher Flood  
Counsel for Mr. Roland Barner  
Assistant Federal Defender  
Tel.: (212) 417-8734

cc: AUSA Shaun Werbelow (by ECF & email)

Application granted. Defendant's sentencing submission is due by April 23, 2025 and the Government's response is due by April 30, 2025. The Clerk of Court is respectfully directed to terminate the pending letter-motion (Doc. 28).

SO ORDERED.

Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
April 16, 2025

Southern District  
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Charles L. Brown  
Clerk-in-Charge